

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROLANDO RAMOS-CARDONA,

Plaintiff,

V.

UNITED STATES DEPARTMENT OF  
EDUCATION, *et al.*,

Defendants.

CIVIL ACTION NO. 5:24-cv-04073

# FIRST UPDATED CERTIFICATION OF INDEX TO ADMINISTRATIVE RECORD

I, Nikki Bowman, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am currently employed as a Supervisory Program Management Analyst by the Office of Loan Portfolio Management for the U.S. Department of Education.
2. The facts attested to herein are based upon my personal knowledge or upon information provided to me in my official capacity, including review of information obtained from various records, systems, databases, other Department of Education (Ed.) employees, and information portals maintained and relied upon by Ed. in the regular course of business.
3. I am the custodian of the administrative record of the agency decision to deny plaintiff Rolando Ramos-Cardona's application for Public Service Loan Forgiveness ("Ramos-Cardona PSLF Administrative Record").

4. The documents referenced in the attached index are records of Ed. and, in part, Ed.'s contractors, MOHELA and Accenture.

5. Some of these records are not individual documents, but are contained within online web portals that are used by Ed. and its contractors to process PSLF forgiveness requests. Where such portals store information, I have copied and pasted or taken screenshots of the web portals, and pasted them into Word documents as part of compiling this record. The following documents contain screenshots that are records from the Department of Education's Salesforce system, a platform used to process PSLF applications: AR006-9, AR0060-61, AR0074-75, and AR161-162. AR0006-9 is a spreadsheet generated by Salesforce when given a query to produce borrower data.

6. I added dates and names of Department of Education employees to RRC\_AR0113-0118 to provide additional information about system notes. Upon further review, I realized the dates on some of these documents are incorrect, insofar as the year is incorrect. In particular, RRC\_AR0113, 0115, and 0116 all reference events occurring in December 2024. These dates should all say December 2023.

7. Document AR00121-123 consists of internal email exchanges between Department of Education employees. These employees are identified as follows, using their former titles, where appropriate:

- a. Nikki Harris: this is me. My work email address reflects my maiden name.
- b. Karen Bauer and Brian Siegel: Department of Education attorneys.
- c. Margaret Ayanian: Supervisory Management and Program Analyst
- d. Mark LaVia: Deputy Director of Systems and Borrower Processing Division.

8. The documents listed in the accompanying Administrative Record Index and contained in the files annexed hereto, constitute to the best of my knowledge and belief, a true and complete copy of all non-privileged documents and materials considered by Ed. in deciding to deny the PSLF application of Mr. Ramos-Cardona and the request for reconsideration of the denial.

Executed this \_25\_\_ day of June, 2025

NIKKI BOWMAN  Digitally signed by NIKKI  
BOWMAN  
Date: 2025.06.25 14:32:44 -04'00'

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Nikki Bowman  
Supervisory Program Management /  
Analyst

**Ramos-Cardona PSLF Administrative Record  
Index**

**List of Materials in the Record**

<b>Item No.</b>	<b>Document Title (Description)</b>	<b>Document Nos.</b>
1.	(Number not used)	
2.	(Number not used)	
3.	(Number not used)	
4.	USDS 34000- Requirement v3.0.0	RRC_AR0001-0003
5.	PSLF- PSLF Employer Adjudication Processing- (DP, Email-to-Case, Manual)	RRC_AR0004-0005
6.	R. Ramos-Cardona- NSLDS PSLF Data (spreadsheet)	RRC_AR0006-0009
7.	r_PSLF Application- Received 8.3.22 <sup>1</sup>	RRC_AR0010-0012
8.	r_PSLF Application- Received 9.13.22 <sup>2</sup>	RRC_AR0013-0021
9.	r_PSLF Application- Received 9.30.22 <sup>3</sup>	RRC_AR0022-0030
10.	r_PSLF Wel Ltr - 2.18.23 <sup>4</sup>	RRC_AR0031-0034
11.	r_PSLF Dnl Ltr – 2.18.23 <sup>5</sup>	RRC_AR0035-0039
12.	r_PSLF QP Ltr – 3.31.23 <sup>6</sup>	RRC_AR0040-0043
13.	r_PSLF Dnl Ltr – 8.23.23 <sup>7</sup>	RRC_AR0044-0045
14.	EIN 20-0720359, Determination Case 08708645, PA SOS, SCOTT W WATERMAN PC (11.2.23 search of PA Secretary of State website)	RRC_AR0046-0047

<sup>1</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>2</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>3</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>4</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>5</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>6</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>7</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

15.	EIN 20-0720359-ACB, Determination Case 08708645, By Laws (N4541558).DOCX- Standing Chapter 13 Trusteeship Scott F. Waterman, East	RRC_AR0048-0049
16.	20-0720359-ACB By Laws (N4541558).DOCX-Standing Chapter 13 Trusteeship Scott F. Waterman, Eastern District PA	RRC_AR0050-0051
17.	20-0720359-Home-Scott F. Waterman, Standing Chapter 13	RRC_AR0052
18.	20-0720359-PA DOJ Trustee List-Scott F. Waterman	RRC_AR0053-0055
19.	20-0720359-PA SOS-Scott F. Waterman	RRC_AR0056-0057
20.	20-0720359-PASOS-SCOTT F WATERMAN B	RRC_AR0058-0059
21.	EIN 20-0720359, Reconsideration Case 16738594_Salesforce_Redacted (borrower reconsideration webform entry submitted 11.16.23)	RRC_AR0060-0061
22.	CH 13 Handbook Chapter 2 Sections D	RRC_AR0062-0063
23.	EIN 20-0720359, Reconsideration Case 16738594, 6.15.22 Letter from Employer on Public Serv.	RRC_AR0064-0066
24.	Ch 13 Handbook Chapter 2 Section D	RRC_AR0067-0068
25.	r_Rolando Student Loan Brief Nov 15 2 (dated 12.17.24 on webform) <sup>8</sup>	RRC_AR0069-0072
26.	CCF11152023_EIN 20-0720359_Reconsideration Case 16738594_DOJ Designation as Standing Ch. 13 Trustee_CCF111152023	RRC_AR0073
27.	EIN 20-0720359, Reconsideration Case 16755347_Salesforce_Redacted (borrower reconsideration webform entry submitted 11.17.23)	RRC_AR0074-0075
28.	r_W2 Rolando Ramos-Cardona <sup>9</sup>	RRC_AR0076-0077
29.	CH 13 Handbook Chapter 1 Sections A	RRC_AR0078

<sup>8</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>9</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

30.	CH 13 Handbook Chapter 1 Sections C	RRC_AR0079-0081
31.	CH 13 Handbook Chapter 2 Sections B	RRC_AR0082-0083
32.	CH 13 Handbook Chapter 2 Sections C	RRC_AR0084-0085
33.	CH 13 Handbook Chapter 6 Section A	RRC_AR0086
34.	CH 13 Handbook Chapter 6 Section A II	RRC_AR0087-0095
35.	CH 13 Handbook Chapter 6 Section A III	RRC_AR0096-0097
36.	CH 13 Handbook Chapter 7 Sections A	RRC_AR0098
37.	22.06.15 Letter from Employer on Public Service	RRC_AR0099-0101
38.	39548 Federal Register Vol. 71 No. 134	RRC_AR0102-0107
39.	Ramos-Cardona Review Notes (screenshots of web portal)	RRC_AR0108-0112
40.	Ramos-Cardona Review Notes (annotated to show the dates and individual acting)	RRC_AR0113-0118
41.	r_PSLF Dnl Ltr – 2.2.24 <sup>10</sup>	RRC_AR0119-0120
42.	r_FW. FSA's Trustee Information_redacted <sup>11</sup> –(email thread 12.20.23 – 2.20.24 )	RRC_AR0121-0123
43.	EIN 20-0720359, Determination Case 18740348, 2.28.24 Letter from Employer Scott Waterman	RRC_AR0124-0160
44.	EIN 20-0720359, Reconsideration Case 18495414_Salesforce_Redacted (borrower reconsideration webform entry submitted 03.04.24)	RRC_AR0161-0162
45.	r_PSLF Application- Received 3.14.24 <sup>12</sup>	RRC_AR0163-0168
46.	r_PSLF Application- Received 3.14.24-2 <sup>13</sup>	RRC_AR0169-0170

<sup>10</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>11</sup> This document has been redacted to remove information covered by the attorney-client privilege and that is accordingly not part of the administrative record, and references to another entity whose PSLF employer eligibility was under consideration.

<sup>12</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

<sup>13</sup> This document has been redacted. *See* Fed. R. Civ. P. 5.2.

47.	PSLF Emails (2.18.23 – 2.7.24)	RRC_AR0171-0176
48.	PSLF Employer Search Tool	RRC_AR0177
49.	Ramos_Cardona_Applications (spreadsheet)	RRC_AR0178-0192